

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
EASTERN DIVISION**

GUY EDWARD WHEELOCK, ADC #17000-041

PLAINTIFF

V.

CASE NO. 2:18-CV-00087-KGB-BD

**GENE BEASLEY, Warden;
MS. BRENDA HOY, Health Services Administrator;
DR. SHEILA STINSON-WOODARD;
DR. RAME AWD;
MICHELLE WINGO, P.A.;
SHERYL PHILLIPS; CATHY COOK;
J.F. CARAWAY; IAN CONNERS;
MICHELLE KRUGER; and
JOHN DOES 1-2**

DEFENDANTS

**SEPARATE DEFENDANTS' DR. RAME AWD AND DR. SHELIA WOODARD'S
STATEMENT OF UNDISPUTED FACTS**

Come Separate Defendants, Rame Awd, M.D. and Shelia Woodard, M.D., by and through their attorneys, Hardin, Jesson & Terry, PLC, for their Statement of Undisputed Facts pursuant to Rule 56.1 of the Rules of United States District Courts for the Eastern and Western Districts of Arkansas, state:

1. At all applicable times, Mr. Guy Wheelock was an inmate at the Forrest City Federal Correctional Institution.
2. Plaintiff was treated for diabetes, cardiac issues, high blood pressure, high cholesterol and esophageal reflux at the Health Services Clinic.
3. In the Spring of 2015, Plaintiff requested that his Medical Care Level be decreased; the request was denied. *See* Complaint.
4. On June 4, 2015, Plaintiff requested that Dr. Awd reduce his medical level; Dr. Awd refused this request. *See* Complaint.

5. One June 30, 2015, Plaintiff's medications and labs were reviewed by the Nurse Practitioner and Dr. Woodard. *See* Clinical Encounter, attached hereto as Exhibit 1.

6. Plaintiff did not show up for labs on August 31, 2015; September 17, 2015; September 22, 2015 and September 23, 2015 and refused all lab orders. *See* Clinical Encounters, attached hereto as Exhibit 2 and Medical Treatment Refusal attached hereto as Exhibit 3.

7. On October 28, 2015, Plaintiff refused an influenza vaccine. *See* Consent, attached hereto as Exhibit 4.

8. On April 1, 2016, Plaintiff refused routine health appointments. *See* Medical Treatment Refusal attached hereto as Exhibit 5.

9. On August 8, 2016, Plaintiff refused lab testing. *See* Medical Treatment Refusal attached hereto as Exhibit 6.

10. Plaintiff did not show up for a chronic care appointment on August 26, 2018. *See* Clinical Encounters, attached hereto as Exhibit 7.

11. On November 23, 2016, Plaintiff refused an influenza vaccine. *See* Consent, attached hereto as Exhibit 8.

12. On November 29, 2016, Plaintiff refused diabetic medication. *See* Medical Treatment Refusal attached hereto as Exhibit 9.

13. On March 29, 2017, Plaintiff was seen by Dr. Woodard. Plaintiff continued to deny all medical care so that his conditions would worsen and he could be transferred. *See* Clinical Encounters, attached hereto as Exhibit 10.

14. Plaintiff refused labs in June 2017. *See* Clinical Encounters and Medical Treatment Refusal, attached hereto as Exhibit 11.

15. On February 12, 2018, Plaintiff refused an influenza vaccine. *See* Clinical

Encounters, attached hereto as Exhibit 12.

16. On June 18, 2018, Plaintiff filed his Complaint in this matter.

Respectfully submitted,

Kynda Almefty
Arkansas Bar #2004197
Attorney for Separate Defendant –
Rame Awd, M.D. and
Shelia Woodard, M.D.
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CERTIFICATE OF SERVICE

I, Kynda Almefty, one of the attorneys for Separate Defendant herein, do hereby certify that on December 18, 2019, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing, and that a true and correct copy of the above and foregoing was sent via the US Postal Service, pre-paid, marked “legal document” to the following non-CM/ECF participant:

Guy Edward Wheelock, Reg #17000-041
FCI FORREST CITY LOW
FEDERAL CORRECTIONAL INSTITUTION
P.O. BOX 9000
FORREST CITY, AR 72336

/s/Kynda Almefty
Kynda Almefty